

Data Incident Notification Toolkit

Version 2.1: May 2013



We also recommend reviewing the complementary [Sensitive Data Exposure Incident Checklist](#)

Purpose

To provide a toolkit with templates, tips, and examples that can be referred to during the process of notifying potential victims of data compromise.

Introduction

The resources provided here cover a range of issues that commonly arise in the heat of the moment when responding to data incidents. If your institution has a data incident, you will find these templates helpful on topics such as building a press release, drafting a notification letter to potential victims, creating a website with information about the specific incident, preparing for the handling of hotline calls and frequently asked questions, and constructing a website with tips on preventing and dealing with identity theft. In addition, a selection of other resources have been gathered for your easy reference: federal and state legal requirements; sample college and university policies, procedures, and plans; suggestions for determining the threshold for notification (whether or not to notify); general resources on identity theft; and real-life accounts from colleges and universities who have completed one or more incident notification processes.

If you have suggestions for additional content, or materials you would like to add, please contact security-council@educause.edu.

Notification Templates

These [Data Incident Notification Templates](#) provide sample materials for dealing with all aspects of a data incident.

- [Building a Press Release \(Section One\)](#)
- [Notification Letter Components \(Section Two\)](#)
- [Incident-Specific Web Site Template \(Section Three\)](#)
- [Incident Response FAQ \(Section Four\)](#)
- [Generic Identity Theft Web Site \(Section Five\)](#)

Other Resources

Federal and State Legal Requirements

Note that there are currently no federal requirements, but several bills are in varying stages of approval in Congress, so stay tuned.

- [California SB 1386](#)
- [Data Breach Notification Laws by State](#)
- [Electronic Privacy Information Center \(EPIC\) Bill Track](#)
- [Security Breach Notification Laws](#) – University of Georgia
- [State Security Breach Notification Laws](#) – National Conference of State Legislatures (NCSL)
- [Summary of State Security Freeze and Security Breach Notification Laws](#) – State Public Interest Research Groups

Sample University Policies, Procedures, and Plans

- [Indiana University Protection of Sensitive Institutional and Personal Data](#)
- [Indiana University IT Incident Response Procedures](#)
- [Indiana University School of Medicine Incident Response Policy](#)
- [Miami University Critical Incident Response Plan](#)
- [Purdue University Incident Response Policy](#)
- [University of Delaware Personal Non-Public Information \(PNPI\) Policy](#)
- [University of Delaware Guidelines for Protecting Personal Non-Public Information \(PNPI\)](#)
- [University of Delaware Breach Notification Procedures](#)
- [University of Minnesota Policy on Reporting and Notifying Individuals of Security Breaches](#)

Thresholds for Notification (some suggestions)

- [Thresholds for Notification: Deciding Whether or Not to Notify](#)
- [Determining the Threshold for Security Breach Notification](#) (University of California Office of the President)

Individual University Materials on Prevention and Responses to Actual Incidents

Sample University Resources on Identity Theft

- [Binghamton University](#)
- [Carnegie Mellon University](#)
- [Eastern Kentucky University](#)
- [University of Delaware](#)

- [University of Kansas](#)
- [University of Oklahoma](#)
- [University of Pennsylvania](#)
- [University of Rhode Island](#)
- [Yale University](#)

University Responses to Real Data Security Incidents

- [Johns Hopkins Hospital](#)
- [Missouri State University](#)
- [Oklahoma State University](#)
- [University of California at Los Angeles](#)
- [University of Hawaii System](#)
- [University of Texas at Austin](#)

Articles

- ["Data Breaches in Higher Education: From Concern to Action"](#), by Peter Siegel, EDUCAUSE Review (Volume 43, Number 1, January/February 2008)
- ["Keeping the Guard Up in a Down Economy: Investing in IT Security in Hard Times"](#), by Peter Siegel and Brian Voss, EDUCAUSE Review (Volume 44, Number 5, September/October 2009)
- ["Out of the Breach and Into the Fire"](#), by Heidi Wachs, Kent Wada, and Timothy Lance, EDUCAUSE Review (Volume 43, Number 5, September/October 2008)
- ["Security Breaches: Notification, Treatment, and Prevention"](#), by Rodney Petersen, EDUCAUSE Review (Volume 40, Number 4, July/August 2005)

California Office of Privacy Protection

- [Recommended Practices on Notice of Security Breach Involving Personal Information](#)

Department of Education Resources

- [Department of Education's Office of Inspector General Identity Theft Website](#)
- [What To Do If a Victim of Identity Theft](#)

EDUCAUSE Information Security Guide

- [Network Security](#)
- [Confidential Data Handling Blueprint](#)
- [Data Classification Toolkit](#)
- [Data Protection Contractual Language: Common Themes and Examples](#)
- [Incident Management and Response](#)
- [Security Operations](#)

EDUCAUSE Resource Center Pages

- [Data Governance](#)
- [Data Security](#)
- [Identity Theft](#)
- [Incident Handling/Incident Response](#)

Federal Trade Commission (FTC) Resources

- [FTC Brochure: Facts for Consumers](#)
- [FTC Identity Theft Web Site](#)

Hearing Testimonies

- [UCLA's written testimony](#) provided during a hearing on *Identity Theft: Innovative Solutions for an Evolving Problem*.

Presentations

- ["Cyberprivacy, Cybersecurity, and Cyberliability: The Duty to Disclose Security Breaches Under California's SB 1386"](#) (NACUA 45th Annual Conference)
- ["Damage Control: When Your Security Incident Hits the 6 O'Clock News"](#) (EDUCAUSE 2003)
- ["Effective Incident Response Strategies for Managing Sensitive Data Incidents"](#) (NERCOMP 2010)
- Handout for ["Damage Control: When Your Security Incident Hits the 6 O'Clock News"](#) (EDUCAUSE 2003)
- ["Our Shared Risk, Our Shared Responsibility: Learning to Prevent Confidential Data Loss"](#) (Security Professionals Conference 2011)
- ["When the Bits Hit the Fan: Managing Data Security and Privacy"](#) (EDUCAUSE 2004)

Sony PlayStation Breach

- [PlayStation Network/Qriocity Network Outage FAQ](#)
- [Sony Customer Notification Non-US States](#)
- [Sony Customer Notification US States \(excluding Puerto Rico and Massachusetts\)](#)

- [Sony Customer Notification Massachusetts](#)
 - [Sony Customer Notification Puerto Rico](#)
 - [Update on PlayStation Network and Qriocity](#)
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[?](#) Questions or comments? [i](#) [Contact us](#).

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